

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

UNITED STATES OF AMERICA)	
)	
v.)	Case No, 3:20cr49-MHL
)	
JOSEPH MARVIN BRYANT,)	
<i>Defendant</i>)	
)	

Defendant's Motion to Revoke Detention Order and Set Conditions of Release

COMES NOW, the defendant, Joseph Marvin Bryant, by counsel and pursuant to 18 U.S.C. §3145(b), and files his motion to revoke the detention order and set conditions of release. Mr. Bryant states the following in support of his request:

1. Mr. Bryant appeared before the Court on February 26, 2020 and waived his right to a detention hearing. Soon after this waiver, the COVID-19 pandemic hit causing disruption to normal court procedures.
2. On March 16, 2020, the United States filed a motion to extend time to indict that was granted. On March 27, 2020, the United States filed a second motion to extend the time to indict. Over Mr. Bryant's objection, the Court granted the government's request.
3. Mr. Bryant was indicted on May 27, 2020. At the arraignment on the indictment, Mr. Bryant's trial was set for August 3-4, 2020. On July 13, 2020, the United States filed a motion to continue the trial date. The Court granted the motion, and the parties have been ordered to file a joint motion concerning the trial date on September 15, 2020.
4. Mr. Bryant has been held at the Pamunkey Regional Jail while this matter has been pending. Mr. Bryant is a sixty-one year old man with no prior criminal history. He

also suffers from diabetes. Counsel has spoken to Mr. Bryant's mother and brother who live together in Dade City, Florida. His mother, Thelma Bryant is willing to serve as Mr. Bryant's third party custodian.¹

5. Mr. Bryant requests this Court hold a hearing and that Ms. Bryant's testimony be presented via video from the Federal Court house in Tampa, Florida. At the detention hearing, Mr. Bryant believes that he can overcome the presumption for detention and demonstrate that he is not a flight risk or a danger to the community.

WHEREFORE, Mr. Bryant requests this Court hold a hearing and revoke the detention order and set conditions of release.

Respectfully Submitted,
JOSEPH MARVIN BRYANT

By: _____/s/_____
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¹ Counsel will provide all identifying information for the third party custodian to pretrial services prior to the hearing so that they can interview her and make a determination concerning her suitability.